



U.S. Department of Justice

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VIA ELECTRONIC FILING

Honorable Michael M. Baylson
United States District Court
3810 United States Courthouse
601 Market Street
Philadelphia, PA 19106-1766

Re: United States v. Bridgette Green (18-240)

Dear Judge Baylson:

On April 14, 2020, the defendant, Bridgette Green, filed a Motion for Reduction of Sentence Pursuant to 18 U.S.C. § 3582(c)(1)(A), requesting that she be granted compassionate release because of concerns about Covid-19. On April 21, 2020, the government filed the Government's Motion for Extension of Time to File an Answer. In that filing, the government noted that defendant's motion should be dismissed for failure to exhaust her administrative remedies with the Bureau of Prisons. The government requested an extension of 14 days to respond because it had good reason to believe that Ms. Green was being considered for release to home confinement.

Ms. Green has not yet been approved for release on home confinement. However, the government confirmed today with the Bureau of Prisons that she is in the later part of the process of being evaluated for home confinement, and the government still has good reason to believe that she will be released on home confinement in the near future.

At this time, the government requests that Green's motion for compassionate release be dismissed because she has not exhausted her remedies by first submitting a request to the warden for compassionate release because of Covid-19 concerns. On April 15, 2020, the government confirmed that Green had not submitted such a request to the warden. On that same day, the government contacted defense counsel and suggested that Green make such a request to the warden to start the 30-day clock for exhaustion. As of April 30, Green had not made a request to the warden. Thus, pursuant to *United States v. Raia*, 2020 WL 1647922, at *2 (3d Cir. April 2, 2020), this Court is without jurisdiction, at this time, to consider Green's request for compassionate relief.

The government requests that the Court dismiss Green's motion for release because she has not exhausted her administrative remedies, and the Court is without jurisdiction, at this time, to consider the request.

Sincerely yours,

WILLIAM M. MCSWAIN
United States Attorney

/s Laurie Magid
LAURIE MAGID
Assistant United States Attorney

Cc: Counsel of Record (via ECF)